

REMARKS

Claims 1-20 were pending when last examined. Claims 21-31 have been withdrawn. All pending claims are shown in the detailed listing above.

Claim Rejections – 35 USC § 103

Claims 1-12 and 14-20 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Kledzik (US 5,266,912) in view of Wenzel et al. (US 5,635,757). Applicant respectfully traverses.

Claim 1 as amended recites *inter alia*, “a first ground plane coupled to the first IC chip” and “a second ground plane coupled to the second IC chip; wherein the first ground plane is physically separated and electrically isolated from the second ground plane.” Such limitations are not disclosed or taught in the cited references.

The Examiner asserts:

Kledzik does not disclose that the first ground plane is physically separated and electrically isolated from the second ground plane. However, Wenzel discloses that a first and a seocond [sic] ground planes physically and electrically separated (claim 9). It would have been obvious to one having ordinary skills in the art at the time of the invention to isolate the first and second planes of Kledzik as suggested by Wenzel to avoid noise and cross coupling.”

Office Action, pp. 2-3. Applicant respectfully disagrees.

Wenzel does not disclose or teach avoiding any noise or cross coupling. The relevant language from claim 9 of Wenzel recite, “wherein the ground layer is patterned so as to comprise isolated ground planes in the ground layer.” Clearly this language does not mention anything about noise or cross coupling. Thus, contrary to the Examiner’s assertion, the motivation which the Examiner gives for why Wenzel can be combined with Kledzik is completing lacking in Wenzel’s claim 9. Because the only motivation for combining

Kledzik and Wenzel is found in the Applicant's own Application, Applicant respectfully submits that the Examiner is using impermissible hindsight to reconstruct Applicant's claimed invention. Therefore, this rejection of Applicant's claim 1 cannot stand.

For at least the reasons discussed above, Applicant respectfully requests that this rejection of claim 1 under 35 U.S.C. § 103(a) be withdrawn and this claim be allowed. Furthermore, because claims 2-12 and 14-20 depend from claim 1 and include further limitations, the Applicant respectfully requests that the rejection of these dependent claims under 35 U.S.C. § 103(a) also be withdrawn and that claims 2-12 and 14-20 be allowed.

Claim 13 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Kledzik in view of Wenzel, further in view of Wolf. Applicant respectfully traverses.

Claim 13 depends from claim 1. As discussed above, the combination of Kledzik and Wenzel is improper, and thus cannot stand.

For at least the reasons discussed above, Applicant respectfully requests that the rejection of claim 13 under 35 U.S.C. § 103(a) be withdrawn and this claim be allowed.

CONCLUSION

Applicant respectfully requests that the pending claims be allowed and the case passed to issue. Should the Examiner wish to discuss the Application, it is requested that the Examiner contact the undersigned at (415) 772-7428.

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3/17/08

Date

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March 17, 2008
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Respectfully submitted,



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